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September 30, 2010

**VIA E-FILEING AND FIRST CLASS MAIL**

**Richard J. Bortnick**

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The Honorable Peter G. Sheridan  
Clarkson S. Fisher Building  
& U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

Re: *Susan Latronica et al. v. Royal Caribbean Cruises, Ltd. et al.*  
Civil Action No. 2:09-cv-06148-PGS-ES

Dear Judge Sheridan:

This firm represents Defendant/Cross-Claimant Elec-Tech International Co. Ltd. ("Elec-Tech") in connection with the above matter. We forward this correspondence respectfully requesting that Elec-Tech be dismissed from this case with prejudice.

Your Honor may recall that this is the case where the Plaintiff, Susan Latronica, has alleged that she was injured by a hair dryer she was utilizing while on a cruise to the Caribbean on June 21, 2007. Upon information and belief, the manufacturer and distributor of the subject hair dryer were initially unknown and thus the initial Civil Action Complaint named the distributor and manufacturer as John Doe Defendants. Subsequently, Defendants Royal Caribbean Cruises, Ltd. and Royal Caribbean Cruises International (collectively "Royal Caribbean") allegedly identified the distributor of the subject hair dryer as Jerdon Products, LLC ("Jerdon"). A First Amended Complaint was filed to accomplish the identification of Jerdon as the distributor John Doe Defendant. Thereafter, Jerdon identified Elec-Tech as the manufacturer of the subject hair dryer. Accordingly, a Second Amended Complaint was then filed identifying Elec-Tech as the John Doe Defendant which was the manufacturer of the subject hair dryer.

Jerdon later withdrew its assertion that Elec-Tech was the manufacturer of the subject hair dryer, and confirmed same via amended interrogatory answers and documents. In these materials, Jerdon advised that Elec-Tech, in fact, was *not* the manufacturer of the subject hair

The Honorable Peter G. Sheridan

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dryer, but that, instead, the true manufacturer was Oriental Universe. Accordingly, Jerdon has served sworn assertions in its interrogatory answers, and supplied documentation, confirming that the true manufacturer of the subject hair dryer is Orient Universe and not Elec-Tech.

In light of this disclosure, Elec-Tech circulated a Stipulation to Dismiss Elec-Tech, with prejudice, which all parties have executed. A copy of the executed Stipulation to Dismiss is enclosed herewith.

Based on the foregoing, Elec-Tech respectfully requests that the enclosed form of Order be entered, dismissing Elec-Tech (a wrongly named party), only, from this matter.

Thank you for your consideration.

Sincerely,

COZEN O'CONNOR



By: Richard J. Bortnick

RJB/gd

Enclosure

cc: Magistrate Judge Esther Salas  
Deirdre M. Dennis, Esquire  
Mitchell B. Seidman, Esquire  
Eric M. Underriner, Esquire

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*Attorneys for Defendant, Elec-Tech International Co. Ltd.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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SUSAN LATRONICA and MICHAEL  
LATRONICA,

Plaintiffs,

v.

ROYAL CARIBBEAN CRUISES, LTD.,  
ROYAL CARIBBEAN INTERNATIONAL,  
JERDON PRODUCTS, LLC, ELEC-TECH  
INTERNATIONAL CO. LTD., JOHN DOE  
DEFENDANT #4, JOHN DOE DEFENDANT  
#5, and JOHN DOE DEFENDANTS #6  
THROUGH #15,

Defendants.

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: **CIVIL ACTION NO.:**

: **2:09-cv-06148-PGS-ES**

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: **STIPULATION TO DISMISS**  
: **DEFENDANT/CROSS-CLAIMANT**  
: **ELEC-TECH INTERNATIONAL CO., LTD**

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IT IS HEREBY STIPULATED AND AGREED, by all parties appearing herein, through their respective undersigned counsel, that, pursuant to Fed. R. Civ. P. 41(a)(1)(ii) and (c), all claims, cross claims and third party claims set forth in the above captioned matter are hereby dismissed with prejudice as to Defendant/Cross-Claimant Elec-Tech International Co. Ltd., only.



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*Attorneys for Plaintiffs Susan Latronica  
And Michael Latronica*

Dated August 30, 2010



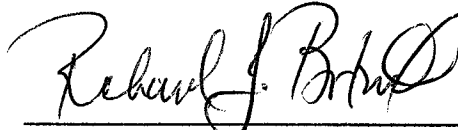
Deirdre M. Dennis, Esquire  
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*Attorneys for Defendant Jerdon Products,  
LLC*

Dated <sup>Sept.</sup> ~~August~~ 10, 2010



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*Attorneys for Defendants  
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and Royal Caribbean International, Ltd.*

Dated <sup>set</sup> ~~August~~ 20, 2010



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Dated <sup>September 29</sup> ~~August~~ 29, 2010

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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SUSAN LATRONICA and MICHAEL  
LATRONICA,

Plaintiffs,

v.

ROYAL CARIBBEAN CRUISES, LTD.,  
ROYAL CARIBBEAN INTERNATIONAL,  
JERDON PRODUCTS, LLC, ELEC-TECH  
INTERNATIONAL CO. LTD., JOHN DOE  
DEFENDANT #4, JOHN DOE DEFENDANT  
#5, and JOHN DOE DEFENDANTS #6  
THROUGH #15,

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: **CIVIL ACTION NO.:**

: **2:09-cv-06148-PGS-ES**

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**ORDER**

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 2010, upon consideration of the parties' Stipulation to Dismiss Defendant/Cross-Claimant Elec-Tech International Co., Ltd. ("Stipulation"), it is hereby **ORDERED** and **DIRECTED** that the parties' Stipulation is **APPROVED** as follows:

All claims, cross claims and third party claims set forth in the above captioned matter are hereby dismissed, with prejudice, as to Defendant/Cross-Claimant Elec-Tech International Co. Ltd., only.

BY THE COURT:

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JUDGE

**CERTIFICATE OF SERVICE**

Richard Bortnick, of full age, declares under penalty of perjury:

On September 30, 2010, a copy of the Stipulation to Dismiss Defendant/Cross-Claimant Elec-Tech International Co., Ltd., Proposed Order to Dismiss Defendant/Cross-Claimant Elec-Tech International Co. Ltd., and letter to the Court were served via Electronic Filing and U.S. Mail on counsel at the addresses listed below:

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2010*